



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

March 14, 2024

Application granted.

By ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

SO ORDERED.

Hon. Ronnie Abrams
March 15, 2024

Re: *United States v. Mustafa Ozsusamlar*, 05 CR 1077 (RA)

Dear Judge Abrams,

With the consent of the defendant through appointed counsel Ms. Esere Onaodowan, the Government writes in response to the Order of the Court dated February 14, 2024 (the “2/14 Order”) to request an extension of one week to the briefing schedule set upon the defendant’s pending motion for a sentence reduction. Unfortunately, the Government, which has not participated in the above-captioned case since in or about 2021, overlooked the 2/14 Order until yesterday, which the Government regrets. The defendant’s present release date is in or about April 2031, and the downward shift in the applicable range under the United States Sentencing Guidelines that Probation believes applies in light of a retroactive amendment to the United States Sentencing Guidelines is less than two years. With the requested extension, the response of the Government would be due on March 21, 2024 and any reply from the defendant would be due on April 22, 2024. The Government appreciates the consideration of the Court and apologizes for its oversight.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

By: Thomas John Wright
Thomas John Wright
Assistant United States Attorney
(212) 637-2295

cc: Esere Onaodowan, Esq. (Counsel to Defendant Mustafa Ozsusamlar) (by ECF)
Christine Delince, Esq. (Counsel to Defendant Mustafa Ozsusamlar) (by ECF)